



WILLIAM P. DENI, JR.
Director

Gibbons P.C.
One Gateway Center
Newark, New Jersey 07102-5310
Direct: (973) 596-4853 Fax: (973) 639-8373
wdeni@gibbonslaw.com

February 8, 2022

VIA ECF

Hon. P. Kevin Castel, U.S.D.J.
United States District Court
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

Re: Michael Todd Beauty LP v. Sony Group Corporation, et al.
Case No. 22-cv-00607 (PKC)

Dear Judge Castel:

This firm, along with Finnegan, Henderson, Farabow, Garrett & Dunner, LLP, represents Defendants Sony Group Corporation and Sony Corporation of America (collectively, "Defendants") in the above-referenced action. We write to respectfully request (1) a 30-day extension of time, until April 27, 2022, for Defendant Sony Corporation of America to respond to Plaintiff's Complaint; and (2) that the initial conference currently scheduled for April 1, 2022, be adjourned until at least 14 days after April 27, 2022. Plaintiff's counsel does not object to these requests.

Defendants have waived service of the Summons and Complaint. Accordingly, Sony Corporation of America's response deadline is currently March 28, 2022, and the response deadline of Sony Group Corporation (a corporation of Japan) is currently April 27, 2022 (though incorrectly entered as March 28, 2022). (ECF Nos. 13-14). With the requested extension, Sony Corporation of America's response deadline would also be April 27, 2022. There have been no previous requests for an extension of this deadline. The extension is being requested to (1) provide Defendants' counsel sufficient time to review the pleadings and prepare responses and (2) align Defendants' respective deadlines to respond to the Complaint.

Defendants also request that the initial conference currently scheduled for April 1, 2022, be adjourned until at least 14 days after the April 27, 2022 response deadline, as per Section 1.B. of Your Honor's individual practices.

We thank the Court for its time and attention to this matter and remain available at the Court's convenience to address any questions or concerns.

Respectfully submitted,

s/ William P. Deni, Jr.
William P. Deni, Jr.

cc: All counsel of record (via ECF)